



# University of Hawaii at Manoa

Environmental Center  
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June 28, 1988  
RP:0090

District Engineer (PODCO-O)  
U.S. Army Corps of Engineers  
Building 230  
Fort Shafter, Hawaii 96858

Dear Sir:

General Permit PODCO-O GP 77-1-E  
U.S. Army Corps of Engineers  
Utility Lines in or Above Navigable Waters of the United States  
Nationwide

In response to your request, we have reviewed the proposed extension of the general permit PODCO-O GP 77-1-E, dealing with utility lines in or above navigable waters of the United States. This review was conducted with the assistance of Belinda Tilley, Environmental Center, and we offer the following comments relevant to the proposed extension.

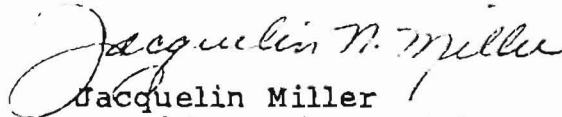
The existing general permit serves to, "reduce delays, duplications, paperwork and resource demands in permit processing and allows prompt action and efficient scheduling for these minor activities, resulting in cost savings to those proposing the work and to the government." While we certainly recognize and concur with efforts to and make administrative procedures more efficient, we are concerned with the potential environmental implications of the proposed extension of the existing General Permit to include utility lines pertinent to geothermal power in or above navigable waters of the United States. The State of Hawaii is proposing to develop an electric generating facility utilizing geothermal power. The plans call for the power to be transmitted between islands via a submarine cable system. The present language of the General Permit does not define "minor activities" therefore it is unclear if the proposed submarine cables from the geothermal electric facility would fall under the General Permit. Environmental concerns relevant to such submarine cable systems are likely to be quite significant and we believe that it would be inappropriate to include submarine electric power transmission cables under the aegis of the General Permit.

District Engineer (PODCO-0)      -2-

June 28, 1988

We appreciate the opportunity to provide comments on this notice.

Yours truly,

A handwritten signature in cursive script, reading "Jacquelin N. Miller".

Jacquelin Miller  
Associate Environmental Coordinator

cc: OEQC  
L. Stephen Lau  
Belinda Tilley